

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

CRIMINAL NO. 22-342 (SCC)

[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendants.

**RENEWED MOTION FOR PROTECTIVE ORDER PURSUANT TO SECTION 3 OF
THE CLASSIFIED INFORMATION PROCEDURES ACT**

Pursuant to Section 3 of the Classified Information Procedures Act, 18 U.S.C. App. III (CIPA), the “Revised Security Procedures Established Pursuant to Pub. L. 96-456, 94 Stat. 2025, by the Chief Justice of the United States for the Protection of Classified Information” (“Security Procedures”) (reprinted after CIPA Section 9), Rules 16 and 57 of the Federal Rules of Criminal Procedure, and the general supervisory powers of the Court, and to protect the national security, the Government moves the Court to enter the proposed Protective Order, attached hereto, regarding the disclosure and dissemination of classified national security information.

The parties have met and conferred regarding this motion and Counsel for Mr. Herrera has agreed to the Proposed Order. (*See* Attachment A.) Counsel for Ms. Vazquez has stated she has no intention on pursuing a defense related to CIPA. (*See* ECF No. 588.) Mr. Rossini’s counsel had previously indicated they had no objection to the Government’s previously submitted Proposed Order, but the Government has not yet confirmed their position with regards to the updated attached Proposed Order.¹

¹ Government counsel and counsel for Mr. Herrera were able to agree on the proposed order today. Counsel for Mr. Rossini was sent the updated version tonight. Government counsel has every impression that

Certificate of Service

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

RESPECTFULLY SUBMITTED, this 9th day of September 2024.

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S Department of Justice

/s/ Nicholas W. Cannon
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counsel for Mr. Rossini will have no objection to the terms, but if they do, counsel for the Government will alert the Court immediately.